

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

In re Entresto (Sacubitril/Valsartan) Patent
Litigation

C.A. No. 20-2930-RGA

NOVARTIS PHARMACEUTICALS
CORPORATION,

Plaintiff,

v.

C.A. No. 22-1395-RGA

MSN PHARMACEUTICALS INC.,
MSN LABORATORIES PRIVATE
LIMITED, MSN LIFE SCIENCES
PRIVATE LIMITED,

Defendants.

JOINT STIPULATION AND [PROPOSED] ORDER

Plaintiff Novartis Pharmaceuticals Corporation (“Novartis”) and Defendants MSN Pharmaceuticals Inc., MSN Laboratories Private Limited, and MSN Life Sciences Private Limited (collectively “MSN”), having jointly stipulated to the following schedule for submission of the final judgment with respect to U.S. Patent No. 11,096,918 in the above-captioned cases, and the Court having considered the parties’ request,

IT IS HEREBY ORDERED this 26 day of June 2025, as follows:

1. The request is **GRANTED**.
2. On July 1, 2025 by 5 pm, Novartis shall provide to MSN two versions of proposed final judgments, with one version assuming that Novartis prevailed on the merits of infringement of ’918 patent claim 1, and another version assuming that Novartis did not prevail on the merits.

3. On July 2, 2025 by 5 pm, MSN shall provide to Novartis any comments on the proposed final judgments, including the basis for any disagreements with Novartis's proposal.
4. If the parties agree on the form of one or both proposed final judgments, the parties shall submit the proposed final judgment(s) to the Court by July 8, 2025.
5. If the parties are unable to agree on the form of one or both proposed final judgments, on July 8, 2025, the parties may each submit a brief limited to 15 double-spaced pages in support of their respective proposed final judgments and any supporting materials, and on July 10, 2025, the parties may each submit a reply brief limited to 2 double-spaced pages.

/s/ Richard G. Andrews

UNITED STATES DISTRICT JUDGE